

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

MARK MANCINI,
PLAINTIFF

v.

CITY OF PROVIDENCE, by and Through Its
Treasurer, James J. Lombardi, III, and
HUGH CLEMENTS, JR.,
DEFENDANTS.

C.A. No. 13-092-S-PAS

AFFIDAVIT OF MARK MANCINI

I, MARK MANCINI, hereby attest to the following facts:

1. I am over eighteen years old.
2. In 1994, I began working for the Providence Police Department.
3. I have only received formal discipline twice in my career and both times occurred when I was a Patrolman.
4. In 2004, I took a Sergeants Promotional Exam, and I was promoted to the position of Sergeant.
5. I have not been disciplined since I have been a Sergeant.
6. During my employment, I have received letters of commendation and memoranda of merit throughout his career.
7. On November 15, 2010, I injured my right knee in the line of duty chasing a suspect.
8. My doctor, Michael D. Feldman, diagnosed me with *chondromalacia* of the right knee.
9. My workplace injury required me to undergo extensive physical therapy.
10. On February 3, 2011, I had surgery on my right knee.
11. As a result of my workplace injury, my employer placed me on IOD Status.
12. Eventually, my workplace injury improved, and I returned to work on light duty status in May 2011.


13. At the time I sat for the June 2012 Lieutenants Exam, my workplace injury substantially limited my ability to stand, walk, bend, lift, and work.
14. At the time I sat for the June 2012 Lieutenants Exam, my physical impairment substantially limited my ability to stand, walk, bend, lift, and work as compared to the average member in society.
15. If I did not undergo mitigating measures such as taking anti-inflammatory medication and pain medication, my physical impairment would have substantially limited my ability to stand, walk, bend, lift, and work as compared to the average member in society.
16. On September 2, 2011, against my wishes and as a direct result of a directive from my employer, I reluctantly filed for accidental disability benefits with the City of Providence Employees' Retirement System
17. When my application for retirement on accidental disability benefits was denied, my employer refused to put me back to work on light duty status.

Signed and sworn this 26th day of May 2017.

Mark Mancini
MARK MANCINI

STATE OF RHODE ISLAND
PROVIDENCE COUNTY

On the 26th day of May 2017, before me personally appeared **MARK MANCINI**, to me known and known by me to be the person executing the foregoing instrument, and she acknowledged said instrument, by her so executed, to be her free act and deed.


Mark P. Gagliardi,
Notary Public

My commission expires: 7/9/20